



U.S. Department of Justice

United States Attorney
Southern District of New York

The Jacob K. Javits Federal Building
26 Federal Plaza, 37th Floor
New York, New York 10278

January 29, 2025

BY ECF & EMAIL

Honorable Lorna G. Schofield
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *United States v. Merced-Perez*, 22 Cr. 576 (LGS)

Dear Judge Schofield:

The Government writes to request that time be excluded under the Speedy Trial Act, [18 U.S.C. § 3161\(h\)\(7\)](#), until the February 24, 2025, the date of the next status conference. The Government has extended a plea offer to the defendant, and the defendant recently engaged new counsel. (See [Dkt. No. 16](#)). Accordingly, the Government respectfully submits that the proposed exclusion would be in the interest of justice as it would allow defense counsel the opportunity to get up to speed on the case, including discussing the pending plea offer with his client. Defense counsel consents to this request. (See [Dkt. No. 16](#)).

Respectfully submitted,

DANIELLE R. SASSOON
United States Attorney

LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

by: /s/
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Southern District of New York
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cc: Ronald Rubenstein, Esq. (via Email and ECF)

Application Granted. The Court finds that the ends of justice served by excluding the time between today and February 24, 2025, outweigh the best interests of the public and the Defendant in a speedy trial as provided in 18 U.S.C. § 3161(h)(7)(A) because, among other things, the parties are presently engaged in discussions regarding a potential disposition of this matter and the exclusion would allow for those discussions to continue. It is hereby ORDERED that the time between today and February 24, 2025, is excluded. The Clerk of the Court is directed to terminate the letter motion at docket number 21.

Dated: February 4, 2025
New York, New York